

1 Thomas B. Vertetis  
2 Elizabeth P. Calora  
3 William T. McClure  
4 Pfau, Cochran, Vertetis & Amala, PLLC  
5 909 A Street, Suite 700  
6 Tacoma, WA 98402  
7 (253) 777-0799  
8 [tom@pcvalaw.com](mailto:tom@pcvalaw.com)  
9 [elizabeth@pcvalaw.com](mailto:elizabeth@pcvalaw.com)  
10 [wmcclure@pcvalaw.com](mailto:wmcclure@pcvalaw.com)

Eric Fong  
Fong Law  
569 Division St., Suite 300  
Port Orchard, WA 98366  
(360) 876-8205  
[eric@ericfonglaw.com](mailto:eric@ericfonglaw.com)

11 **UNITED STATES DISTRICT COURT**  
12 **WESTERN DISTRICT OF WASHINGTON**  
13 **AT TACOMA**

14 KATYE HURLBUT and DUSTIN  
15 HURLBUT, and the marital community  
16 comprised thereof,

17 Plaintiffs,

18 vs.

19 UNITED STATES; MADIGAN ARMY  
20 MEDICAL CENTER, a governmental  
21 entity; JANE and JOHN DOES 1-10, in  
22 their respective individual capacities,

23 Defendants,

NO. 3:22-cv-05819-TL

**STIPULATED VOLUNTARY DISMISSAL**  
**PURSUANT TO FEDERAL RULE**  
**41(a)(1)(A)(ii)**

**NOTE ON MOTION CALENDAR:**  
**April 12, 2023**

24 IT IS HEREBY STIPULATED AND AGREED by and between the parties and their  
25 respective counsels that the above-captioned action is voluntarily dismissed, with  
26 prejudice and without fees or costs pursuant to the Federal Rules of Civil Procedure  
41(a)(1)(A)(ii).

RESPECTFULLY SUBMITTED: April 12, 2023.

Vanessa R. Waldref  
United States Attorney for EDWA

*s/Joseph P. Derrig*  
*s/Derek T. Taylor*

Joseph P. Derrig, WSBA No. 44394  
Derek T. Taylor, WSBA No. 46944  
Assistant United States Attorneys and  
Special Attorneys Acting Under  
Authority Conferred by 28 U.S.C. §515  
United States Attorney's  
920 W. Riverside Ave, Ste 340  
Spokane, WA 99201  
Phone: (509) 353-2767  
Fax: (509) 835-6397

Email: [USAWAE-jderrigECF@usdoj.gov](mailto:USAWAE-jderrigECF@usdoj.gov)  
[USAWAE-dtaylorECF@usdoj.gov](mailto:USAWAE-dtaylorECF@usdoj.gov)

*Attorneys for Defendant*

PFAU, COCHRAN, VERTETIS & AMALA, PLLC

*s/Thomas B. Vertetis*  
*s/Elizabeth P. Calora*  
*s/William T. McClure*

Thomas B. Vertetis, WSBA No. 29805  
Elizabeth P. Calora, WSBA No. 42527  
William T. McClure, WSBA No. 54622  
909 A Street, Suite 700  
Tacoma, WA 98402  
Phone: (253) 777-0799

Email: [tom@pcvalaw.com](mailto:tom@pcvalaw.com)  
[elizabeth@pcvalaw.com](mailto:elizabeth@pcvalaw.com)  
[wmclure@pcvalaw.com](mailto:wmclure@pcvalaw.com)

*FONG LAW OFFICE*

*s/Eric Fong*  
569 Division Street, Suite 300  
Port Orchard, WA 98366  
Phone: (360) 876-8205  
*Attorneys for Plaintiffs*

The parties having stipulated and agreed, it is SO ORDERED. This case is DISMISSED with prejudice and without fees or costs.

DATED this 13th day of April 2023.



Tana Lin  
United States District Judge